

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

KENNETH D. BELL, in his capacity as court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com,)
Plaintiff,)
vs.)
TODD DISNER, in his individual capacity and in his capacity as trustee for Kestrel Spendthrift Trust;)
TRUDY GILMOND; TRUDY GILMOND, LLC;)
JERRY NAPIER; DARREN MILLER; RHONDA GATES; DAVID SORRELLS; INNOVATION MARKETING, LLC; AARON ANDREWS; SHARA ANDREWS; GLOBAL INTERNET FORMULA, INC.; T. LEMONT SILVER; KAREN SILVER; MICHAEL VAN LEEUWEN; DURANT BROCKETT; DAVID KETTNER; MARY KETTNER; P.A.W.S. CAPITAL MANAGEMENT LLC; LORI JEAN WEBER; and a Defendant Class of Net Winners in ZEEKREWARDS.COM; Defendants.)
)

No. 3:14-cv-91

AFFIDAVIT IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT

Michael Busen, being duly sworn, deposes and says:

1. I am over the age of 18 and am competent to sign this Affidavit. The facts stated in this Affidavit are based on my personal knowledge and information that I have learned in the course of my work on behalf of the Receiver for Rex Venture Group, LLC ("RVG") over the past twenty-two months.
2. I understand this Affidavit will be used in support of the Receivership's Motion for Default Judgment against Defendant Todd Disner.
3. I am a Managing Director within the Forensic and Litigation Consulting practice of FTI Consulting, Inc. ("FTI"). I have been employed by FTI for six years.
4. Payments made to and received by affiliates of the ZeekRewards program are identified in the internal records of RVG, including a SQL database ("Zeek database")

maintained by RVG.

5. Through my work for the Receivership, I have become familiar with the Zeek internal records and the steps required to appropriately identify payments made to affiliates over the course of the ZeekRewards program.

6. A spreadsheet listing each payment to Todd Disner, including the amount and date on which the transfer occurred, is attached to this Affidavit. (Exhibit 1).

7. The payment amounts listed on Exhibit 1 have also been compared to available third party bank statements and e-wallet data to the extent those exist to further establish their accuracy.

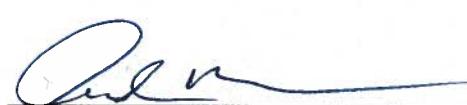
Executed this 3rd day of July, 2014.


Michael Busen

District of County, Columbia

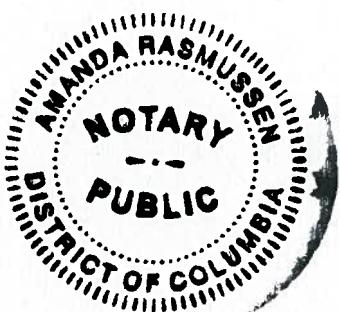
Signed and sworn to before me this day by Michael Busen
(Affiant's printed name)

Date: 7/8/2014


(Notary signature)

Amanda Rasmussen, Notary Public
(Notary printed name)

My commission expires: 10-31-14.



Summary of ZeekRewards Transactions with Todd Disner

EXHIBIT 1

Summary of Cash Paid In Recorded in RVG Database

Date	Bid Purchases	Subscription Payments	Total
3/4/2011	\$480.00		\$480.00
3/17/2011	\$300.00		\$300.00
4/23/2011		\$11.00	\$11.00
6/11/2011		\$18.69	\$18.69
7/16/2011		\$17.50	\$17.50
8/13/2011		\$92.30	\$92.30
9/10/2011		\$99.00	\$99.00
10/8/2011		\$99.00	\$99.00
11/12/2011		\$99.00	\$99.00
2/18/2012		\$99.00	\$99.00
4/1/2012		\$99.00	\$99.00
4/23/2012		\$99.00	\$99.00
6/17/2012		\$99.00	\$99.00
7/5/2012		\$99.00	\$99.00
7/6/2012	\$10,000.00		\$10,000.00
8/10/2012		\$99.00	\$99.00
Total	\$10,780.00	\$1,030.49	\$11,810.49

Summary of Commission Payments Recorded in RVG Database

Date	Available Cash	Diamond Pool	Subscription Commissions	ZAP Commission	Total	Bank Records Difference
5/16/2011	\$732.85				\$732.85	
5/23/2011	\$255.57				\$255.57	
5/30/2011	\$306.06			\$1.20	\$307.26	Check \$1.20 less than db
6/6/2011	\$315.11			\$3.90	\$319.01	Check \$3.90 less than db
6/13/2011	\$312.31				\$312.31	
6/20/2011	\$328.59				\$328.59	
6/27/2011	\$314.30			\$11.30	\$325.60	Check \$11.30 less than db
7/4/2011	\$399.19				\$399.19	
7/11/2011	\$318.99			\$3.00	\$321.99	Check \$3.00 less than db

Summary of ZeekRewards Transactions with Todd Disner

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Summary of Commission Payments Recorded in RVG Database

Date	Available Cash	Diamond Pool	Subscription Commissions	ZAP Commission	Total	Bank Records Difference
7/18/2011	\$475.02				\$475.02	
7/25/2011	\$971.13				\$971.13	
8/1/2011	\$777.12			\$106.80		\$883.92
8/8/2011	\$1,102.65			\$90.40		\$1,193.05
8/15/2011	\$2,180.64			\$206.70		\$2,387.34
8/22/2011	\$2,559.07					\$2,559.07
8/29/2011	\$2,395.05			\$265.00		\$2,660.05
9/5/2011	\$1,322.00			\$399.00		\$1,721.00
9/12/2011	\$2,190.34			\$359.70		\$2,550.04
9/19/2011	\$1,910.69			\$282.20		\$2,192.89
9/26/2011	\$2,114.60			\$421.90		\$2,536.50
10/3/2011	\$3,433.79			\$417.30		\$3,851.09
10/10/2011	\$2,843.21			\$583.60		\$3,426.81
10/17/2011	\$4,337.61			\$766.10		\$5,103.71
10/24/2011	\$5,267.24			\$683.10		\$5,950.34
10/31/2011	\$4,573.53			\$1,314.70		\$5,888.23
11/7/2011	\$5,471.39			\$1,728.10		\$7,199.49
11/14/2011	\$7,410.28			\$2,149.10		\$9,559.38
11/21/2011	\$8,634.70			\$2.59	\$2,486.40	\$11,123.69
11/28/2011	\$8,425.16			\$1,259.30		\$9,684.46
12/5/2011	\$11,694.55			\$4,458.40		\$16,152.95
12/12/2011	\$11,032.11					\$11,032.11
12/19/2011	\$13,139.57			\$7,248.30		\$20,387.87
12/26/2011	\$12,538.71		\$3.99	\$3,277.80		\$15,820.50
1/2/2012	\$9,990.34			\$3,933.40	\$6.50	\$13,930.24
1/9/2012	\$9,995.00					\$9,995.00
1/23/2012	\$22,472.87			\$3,039.90		\$25,512.77
1/30/2012	\$13,365.11			\$4,419.60		\$17,784.71
2/6/2012	\$389.36			\$3,104.10		\$3,493.46
2/13/2012	\$77,633.28			\$3,486.60		\$81,119.88

Summary of ZeekRewards Transactions with Todd Disner

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Summary of Commission Payments Recorded in RVG Database					
Date	Available Cash	Diamond Pool Commissions	ZAP Commission	Total	Bank Records Difference
2/20/2012	\$14,063.85	\$2,665.70		\$16,729.55	
2/27/2012	\$50,101.16			\$50,101.16	
3/5/2012	\$34,181.03		\$125.50	\$34,306.53	
3/12/2012	\$35,431.53		\$3,809.30	\$39,240.83	
3/19/2012	\$69,968.53		\$8,952.30	\$78,920.83	Bank record \$78,920.83 less than db
3/26/2012	\$39,912.58		\$7,603.70	\$47,516.28	
4/2/2012	\$55,634.97		\$2,706.10	\$58,341.07	
4/9/2012	\$50,635.93		\$2,395.90	\$53,031.83	
4/16/2012	\$49,775.04		\$3,392.20	\$53,167.24	
4/23/2012	\$60,564.23		\$11,591.50	\$72,155.73	
4/30/2012	\$47,962.38		\$10,517.90	\$58,480.28	
5/7/2012	\$47,917.21		\$8,774.60	\$56,691.81	
5/14/2012	\$46,439.23		\$11,081.40	\$57,520.63	
5/28/2012	\$5,000.00			\$5,000.00	
6/11/2012		\$86,516.88		\$86,516.88	
6/18/2012	\$54,302.88	\$114,602.78		\$168,905.66	
6/20/2012	\$8,135.09	\$122.30		\$8,257.39	
6/25/2012		\$1,328.20		\$1,328.20	
6/26/2012		\$712.80		\$712.80	
6/27/2012	\$53,066.26	\$552.40		\$53,618.66	
6/29/2012	\$5,153.83	\$193.60		\$5,347.43	
7/2/2012	\$70,639.42	\$6,623.00		\$77,262.42	
7/5/2012	\$927.79	\$93.10	\$1,020.89		
7/9/2012	\$158,279.77	\$18,746.50		\$177,026.27	
7/10/2012		\$1,524.30		\$1,524.30	
7/11/2012		\$529.50		\$529.50	
7/16/2012	\$50,000.00			\$50,000.00	
7/23/2012	\$50,399.04	\$17,246.90		\$67,645.94	
7/26/2012	\$98,356.57	\$8,464.30		\$106,820.87	
7/30/2012	\$94,761.13	\$7,856.60		\$102,617.73	

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Summary of Commission Payments Recorded in RVG Database

Date	Available Cash	Diamond Pool	Subscription Commissions	ZAP Commission	Total	Bank Records Difference
Total	\$1,505,538.54	\$6.58	\$385,236.16	\$6.50	\$1,890,787.78	

Sum of reductions in payments: \$78,940.23

Less NxPay Frozen Funds: \$0.00

Bank Disbursements for Commission Related Categories \$1,811,847.55

Less Amount of Funds Paid Into Program per Database \$11,810.49

Net Winnings \$1,800,037.06